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Arizona Corporation Commission

BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION

JUL 25 2000

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CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

IN THE MATTER OF THE APPLICATION)
OF U S WEST COMMUNICATIONS, INC.,)
A COLORADO CORPORATION, FOR A)
HEARING TO DETERMINE THE EARNINGS)
OF THE COMPANY, THE FAIR VALUE OF)
THE COMPANY FOR RATEMAKING)
PURPOSES, TO FIX A JUST AND)
REASONABLE RATE OF RETURN THEREON)
AND TO APPROVE RATE SCHEDULES)
DESIGNED TO DEVELOP SUCH RETURN)

DOCKET NO. T-01051B-99-0105

MOTION TO COMPEL U S WEST COMMUNICATIONS, INC. (NOW QWEST CORPORATION) TO RESPOND TO STAFF DATA REQUESTS

Staff of the Arizona Corporation Commission ("Commission Staff") hereby moves to compel U S WEST Communications, Inc. ("U S WEST"), which after the recent merger with Qwest, is now called Qwest Corporation ("Qwest") (hereinafter referred to as "Qwest" or the "Company") to respond to certain discovery requests identified herein, and in support thereof, submits the following:

I. BACKGROUND

Both the Commission Staff and the Residential Utility Consumer Office ("RUCO") have simultaneously filed a Motion for an extension of the deadline for filing direct testimony in this case because of outstanding discovery responses, non-responsive answers and the resulting cumulative delays of these non-responses, which are necessary to both Staff's and RUCO's evaluation and recommendations on the Company's application, and the effect of the resulting cumulative delays of these non-responses. The Staff has repeatedly brought the problems to the

1 Company's attention. More recently, at least 2-3 weeks ago, the Staff again raised these issues
2 hoping to avert the need for formal resolution of the matter and the need to extend the existing
3 procedural schedule. The Company did not bring the outstanding responses current as requested
4 and the number of outstanding responses has made it impossible for both the Staff and RUCO to
5 file their direct testimony on July 25, 2000.

6
7 In their motion for an extension of time, the Staff and RUCO are requesting an extension
8 of approximately two weeks to file their direct testimony, or until August 10, 2000, which should
9 allow adequate time to do follow-up discovery as long as the Company is required to
10 immediately provide all outstanding data responses and comply with the five-day turn-around of
11 responses to new discovery. Staff, therefore, requests expedited oral argument on its motion to
12 compel at which time the issue of the need for further modifications to the procedural schedule
13 should be addressed.

14 The outstanding responses to Staff discovery requests fall into the following broad
15 categories: 1) broadband and video asset transfer, 2) reciprocal compensation, 3) OPEB model
16 and funding, 4) incentive compensation issues, 5) parent company executive compensation and
17 incidental expense issues, 6) DEX and yellow page issues, 7) expenses associated with the
18 public policy group, 8) pro forma adjustment issues, 9) advertising and information management
19 expense issues, 10) issues concerning non-regulated revenues and Part 64, and 11) miscellaneous
20 expenses and branding issues.

21
22 Some of the data requests were submitted as far back as May 25, 2000. A list of
23 outstanding responses is attached hereto as Exhibit A. Staff will address the outstanding
24 responses in the context of the broad categories set forth above.

25 Finally, Staff notes that the Company has provided many outstanding responses in the
26 last few days, after Staff filed its Motion for an extension of the Staff/Intervenor direct testimony
27 filing date. Staff notes that the Company has just provided responses to requests UTI 48-2, 48-4
28 (submitted on 5/26), UTI 50-1 (submitted on 6/2), UTI 52-4 (submitted on 6/14), UTI 54-5, UTI

1 54-7, UTI 54-8 (submitted on 6/22), UTI 57-6 (submitted on 6/28), UTI 50-15 (submitted on
2 6/2), UTI 55-7 (submitted on 6/22), UTI 58-7, UTI 58-9, UTI 58-11, UTI 58-15 (submitted on
3 6/30), UTI 59-2, UTI 59-5, UTI 59-6, UTI 59-7, UTI 59-11 through 12, UTI 59-14, UTI 59-15,
4 UTI 59-16, UTI 59-22, UTI 59-23, UTI 59-24, UTI 59-25 (submitted on 7/5), UTI 60-1 through
5 7, UTI 60-15 through 21, UTI 60-22 through 23, UTI 60-24, UTI 60-25 through 26, UTI 60-29,
6 UTI 60-30, UTI 60-32 (submitted on 7/8), UTI 61-1 through 3, UTI 61-4, UTI 61-5, UTI 61-7
7 through 11 (submitted on 7/13), UTI 62-1, UTI 62-2 through 4, UTI 62-6 through 9, UTI 62-12
8 through 13, UTI 62-20 through 24 (submitted on 7/14), UTI 63-1 through 10, UTI 63-12-17, UTI
9 64-1, UTI 64-6 through 10, UTI 64 16 through 20, UTI 64-22, UTI 64-24 and UTI 64-25.

10 Follow-up discovery may be necessary on some of these responses just received.

11 **II. ARGUMENT**

12
13 Arizona R.Civ.Pro. Rule 26(b)(1) provides that any party may obtain discovery “regarding
14 any matter, not privileged, which is relevant to the subject matter involved.” Evidence is relevant
15 if it has “any tendency to make the existence of any fact that is of consequence to the determination
16 of the action more probable or less probable than it would be without the evidence.”

17 There is no question that the information requested by Staff is relevant to the issues raised
18 in this case and “...would make the existence of any fact that is of consequence to the determination
19 of the action more probable or less probable...”.

20 **A. Broadband and Video Assets and Transfer Issues**

21 Set 53, No. 8 (submitted 6/16)

22 Set 60, Nos. 27-28, 31 and 33 (submitted 7/8)

23 Set 62, Nos. 10, 11 (submitted 7/14)

24 **Set 53, No. 8:** Please provide complete copies of al invoices for services provided to US
25 West Broadband Services, Inc. by USWC in 1999 and 2000, to date and explain the basis
26 of pricing for each such service appearing on the invoices. In addition, please provide
27 copies of all studies and underlying calculations supporting amounts charged for such
28 services.

1 **Set 60, No. 27: (Re: USWC response to UTI 50-06 Attachment A)** Please provide
2 complete copies of all monthly invoices to USWC (to date), as required under Article 4
(A) and describe USWC's accounting by FCC sub-account for each such invoice.

3 **Set 60, No. 28: (Re: USWC response to UTI 46-14 Attachment A)** For each listed type
4 of network capacity, please provide monthly volume units and revenue dollars to USWC
(by FCC subaccount), for all months of 1999 and 2000, to date.

5 **Set 60, No. 31: (Re: USWC response to UTI 46-14 Attachment C)** Please identify
6 and describe with particularity each actual and anticipated service in each of the
7 categories (Exhibits A through R) that USWBSI expects to acquire from USWC pursuant
8 to this Master Services and Leased Property Agreement and describe and quantify the
9 ongoing costs and benefits associated with each such service. Provide complete copies
of each Work Order for such services that has been executed (Exhibit S), to date.

10 **Set 60, No. 33: (Re: USWC's responses to UTI 50-04, Attachment A)** Please provide
11 further breakdown of the "Other operating expenses" amount shown by detailed sub-
12 account on USWBSI books, indicating the amounts in each such account that were
charged to USWBSI by USWC.

13 **Set 62, No. 10: (Ref. USWC's response to RUCO 26-04, Attachment A):** Please
14 explain the types and quantities of goods and services being provided to Broadband
15 Services, Inc. associated with each line item of the attachment, and explain whether such
transactions are expected to be ongoing in comparable volumes and amounts.

16 **Set 62, No. 11: (Ref. USWC's response to RUCO 26-04, Attachment A):** Please
17 provide an updated schedule of receipts from Broadband Services, Inc. for all available
18 months of 2000 (January through June on an Arizona JR basis and indicate (identify,
explain and quantify) any amounts therein that are unusual one-time entries or otherwise
non-recurring in nature. Please provide your response in paper and magnetic media.

19 Qwest has been delaying providing the Staff with the information necessary to analyze
20 a myriad of issues involving the Company's Broadband subsidiary. Qwest's filing includes multi-
21 million dollar adjustments to test period revenues, expenses and investment related to its new
22 Broadband Services, Inc. affiliate that Staff must analyze. Qwest filed objections and provided
23 several incomplete responses to some of these data requests recently after extensive delays.
24 However, the Staff needs the rest of the information to determine the level of cost and revenue
25 allocations between the Qwest telephone operating subsidiary and the unregulated broadband
26 subsidiary. The Company's extensive delay in providing these responses and the fact that its
27 responses are incomplete are hampering Staff's Consultants from effectively evaluating this aspect
28 of the Company's application and do follow-up discovery on it.

1 **B. Reciprocal Compensation Issues**

2 Set 43, No. 15 (submitted 5/5)
3 Set 49, No. 1 (submitted 5/31)
4 Set 62, No. 18 (submitted 7/14)

5 **Set 43, No. 15:** Please provide the most detailed available long run forecast of each
6 type of reciprocal compensation amounts expected to be realized by USWC in
7 Arizona in the future, explaining the assumptions and calculations employed in
8 creating such forecast.

9 **Set 49, No. 1: (Ref. Reciprocal Compensation Worksheet)** Please provide
10 supporting documentation indicating amounts by payee for each month and
11 explain/provide any amounts subject to protest or potential refund. In addition,
12 provide monthly reciprocal compensation receipts by carrier/CLEC by FCC
13 subaccount, and explain/provide any amounts subject to protest or potential refund.

14 **Set 62, No. 18:** Please provide a monthly breakdown of reciprocal compensation
15 revenue and expenses by FCC subaccount, indicating for each monthly amount in
16 each subaccount the portion that is attributable to Internet-bound traffic.

17 Qwest has included adjustments in its filing for the payment and receipt of reciprocal
18 compensation on ISP traffic and has also included what they call an automatic rider to incorporate
19 changes in expense levels on a going forward basis. Indeed, reciprocal compensation contributes
20 over \$13 million to the Company's asserted revenue requirement through this adjustment, which
21 remains unsupported by the Company's responses to-date. To the best of Staff's knowledge, Qwest
22 did not object to either of these requests. Qwest recently provided a response to Set 43, Question
23 15 that stated they could not provide a forecast of each type of reciprocal compensation expected to
24 be realized in Arizona in the future. In response to Set 49, No. 2, the Company simply stated,
25 "Qwest Corporation cannot lawfully give out this information," with no explanation or citation to
26 authority. In response to Set 62, No. 18, the Company provided expense information, but none of
27 the revenue data that was requested. Staff finds this response to be inadequate given the Company's
28 request and proforma adjustment. Qwest bears the burden of proof with respect to its application
 in general and with respect to each adjustment in particular. Qwest should be ordered to provide
 the information since it is necessary in order for Staff to determine the reasonableness of this aspect
 of the Company's filing, or withdraw this part of its request.

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C. OPEB's Model and Funding

Set 47, Nos. 9 and 10 (submitted 5/25)

Set 47, No. 9: Ref. USWC response to UTI 13-50 (OPEB Expense): Please supplement the referenced response to provide the updated version of the model to reflect 1999 – in both hard copy and electronic format.

Set 47, No. 10: Ref. USWC response to UTI 4-5 (OPEB Expense): In discussion item 4, USWC states that it “proposes to assign previous shareowner funding to Arizona before it makes incremental, new cash funding to the trust.” Please provide the following:

1. Please provide a quantification of the amount of shareowner funding that USWC would assign to Arizona, showing and explaining all calculations including any implicit/explicit shareowner return.
2. Please explain and provide documentation supporting why the recognition of OPEB costs on a “Commission Basis” has the effect of increasing end-of-period rate base.
3. Please identify and quantify the specific components of OPEB costs which drive this rate base increase.

The information requested in Set 47, Questions 9 and 10 is necessary to determine the reasonableness of the Company's filing relating to OPEB costs. Because of differing regulatory treatments of OPEB costs in the various jurisdictions in which the Company operates, the requested information contains detailed support for the OPEB costs attributed to Arizona ratepayers. To the best of Staff's knowledge, the Company has not objected to the requests; but has simply not provided the response to-date.

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D. Incentive Compensation Issues

Set 53, Nos. 2 and 3 (submitted 6/16)

Set 60, Nos. 11-14 (submitted 7/8)

Set 53, No. 2: Please identify each incentive, bonus and variable compensation arrangement in place for U S West, Inc. personnel in 1999 and provide the following information for each such arrangement:

1. Copies of plan documents describing all terms and conditions governing compensation amounts.
2. Common language description of each compensation plan (as provided to participants, if available),
3. Statement of each input amount used to calculate the actual amount of compensation earned by each participant in the arrangement in 1999,

including but not limited to earnings and cash flow metrics, business goals/objectives, and individual or group achievement targets.

4. Calculations of compensation earned by each participant in each plan, using the input data from (c), above and plan document formulae from (a), above
5. Actual compensation under each plan for each officer level employee of U S West, Inc.
6. Total Compensation (all employees) under each plan by U S West, Inc. RC in 1999,
7. Allocable amounts from (f) within recorded Arizona intrastate expenses of USWC in 1999,
8. Allocable amounts from (f) within recorded Arizona intrastate expenses of USWC in December 1999, as included in the Company's annualized expenses for the test period.

Set 53, No. 3: Please identify each incentive, bonus and variable compensation arrangement in place for U S West Information Technologies personnel in 1999 and provide the following information for each such arrangement:

1. Copies of plan documents describing all terms and conditions governing compensation amounts,
2. Common language description of each compensation plan (as provided to participants, if available),
3. Statement of each input amount used to calculate the actual amount of compensation earned by each participant in the arrangement in 1999, including but not limited to earnings and cash flow metrics, business goals/objectives, and individual or group achievement targets
4. Calculations of compensation earned by each participant in each plan, using the input data from (c), above and plan document formulae from (a), above
5. Total Compensation (all employees) under each plan for IT in 1999,
6. Allocable amounts from (e) within recorded Arizona intrastate expenses of USWC in 1999,
7. Allocable amounts from (e) within recorded Arizona intrastate expenses of USWC in December 1999, as included in the Company's annualized expenses for the test period.

Set 60, No. 11: Re: USWC responses to UTI 2-17 (Incentive Compensation).

Please supplement the referenced response to include comparable information associated with each incentive compensation plan or arrangement that was active during the 1999 test year. [For reference purposes, the question, as updated, is reproduced below].

1. A statement of the recorded costs of the plan/arrangement by month and by FCC Account,
2. Calendar year 1999 and 2000 actual recorded costs for each such plan, in a format comparable to the response to part (a) above,
3. A description of the plan/arrangement in the form approved by senior management and the Board of Directors.

4. A description of the plan/arrangement in the form presented to employees and other participants.
5. A statement of the 1999 objective measures of performance employed by the plan or ranges for same.
6. A statement of the comparable actual "achieved" levels of performance in relation to each objective for calendar 1999.
7. Also, please provide the pay-out matrix used to compare actual achievements with the target objective.

Set 60, No. 12: Re: USWC responses to UTI 2-17 (Incentive Compensation).

During calendar years 1999 or 2000, did USWC discontinue or modify any of the incentive compensation plans such that USWC would no longer continue to incur operating expenses associated therewith (e.g., LTIP)? If so, please describe the related plan changes or terminations.

Set 60, No. 13: Re: USWC responses to UTI 2-17 (Incentive Compensation).

Please provide the following information with regard to the 1999 test year incentive compensation expense:

1. Please provide a breakdown of test year expense between each plan (i.e., Annual Bonus Plan, Performance Bonus Plan, Occupational Team Award, Merit Awards, STIP and LTIP), showing allocation to Arizona intrastate operations.
2. Referring to the response to item (a) above, please provide a further breakdown of the Annual Bonus plan by element (e.g., Net Cash Flow, Revenue, USWC Net Income, Business Unit Results, Customer Value Analysis, etc.). [Note: See the confidential response to PRC 36-1S1 in the pending New Mexico rate proceeding.].

Set 60, No. 14: Re:USWC responses to UTI 2-17 (Incentive Compensation).

Please provide the following information with regard to the Business Unit component of the 1999 test year ABP incentive compensation plan. [Note: The format containing most of this information is presented in the confidential response to Staff/UTI 35-8 in the pending New Mexico rate proceeding.]

1. Please identify and describe each individual business unit.
2. For each individual business unit, please provide the performance target(s).
3. For each individual business unit, please provide the achieved results(s).
4. For each individual business unit, please provide the weighting factors used to derive the composite achieved results.
5. For each individual business unit, please provide the pay-out matrix.
6. For each individual business unit, please provide a copy of the plan documentation.
7. For each individual business unit, please provide copy of the information distributed to employees and other participates which discuss, describe and outline plan year terms, conditions and expectations.

1 The Company did not file an objection to these Staff requests; but simply has failed to-date
2 to provide a response to the questions. These discovery requests are clearly relevant since they
3 should provide the detailed information necessary for Staff to determine whether the amounts
4 claimed by the Company for incentive compensation are reasonable.

5 **E. U S WEST Inc. (Parent) Compensation and Incidental Expense Issues**

6 Set 55, Nos. 3, 5 and 6 (submitted 6/22)

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8 **Set 55, No. 3: (Re: USWC's response to UTI 53-06, Attachment A):** Please provide a
9 detailed statement of the corporate aircraft trips (city pairs and passenger manifest, as
available) and costs charged to RC 02100000 in the indicated amount for the test period.

10 **Set 55, No. 5: (Re: USWC's response to UTI 53-01, Attachment A)** For each indicated
11 element of Mr. Trujillo's 1999 "annual compensation" totaling \$18,334,434 and "long-term
12 compensation" totaling \$1,102,624, please indicate the USWI distribution by RC and FCC
13 Account, and provide allocation information indicating the amount of each element of
compensation that is included in recorded and proposed test period expenses in the
Company's filing.

14 **Set 55, No. 6: (Re: USWC's response to UTI 53-01, Attachment A)** For each indicated
15 element of 1999 compensation to each executive listed in the "SUMMARY
16 COMPENSATION TABLE" other than Mr. Trujillo, please the entities recording the costs,
17 any USWI distribution by RC and FCC Account, and provide allocation information
indicating the amount of each element of compensation that is included in recorded and
proposed test period expenses in the Company's filing.

18 While the Company objected to providing this information, the information requested is
19 clearly relevant to the issue of parent company cost allocations to Qwest in the proposed test period
20 and the reasonableness of the Company's allocations and compensation amounts contained in its
21 updated filing. Staff requests that the Company be required to immediately provide responses to
22 Set 55, Questions 3 through 6 relating to parent company executive compensation and incidental
23 expenses, allocated to Qwest in Arizona.

24 **F. DEX and Yellow Page Revenues**

25 Set 62, Nos. 2 and 5 (submitted 7/4)

26
27 **Set 62, No. 2: (Ref. USWC's responses to UTI 57-07)** Please provide a copy of the
28 referenced FCC Order and identify and quantify each price change implemented to
comply with the referenced FCC Order. In addition, provide calculations to

1 annualize the impact of each price change for each of the fees received by U S WC
2 from DEX and provide any further ratemaking adjustments that are required.

3 **Set 62, No. 5:** Is Ms. Koehler-Christensen aware of any other incumbent LEC or
4 independent LEC that pays its publishing affiliate or a non-affiliated publisher for the
5 costs associated with manufacturing or distributing either the white or yellow pages
6 directories in its service area? If affirmative, please identify each such LEC, explain
7 the nature and amount of such payment, and provide complete copies of documents
8 supportive of your response.

9 The Company has proposed complete elimination of directory imputation in its filing, based
10 upon cost and value theories advanced by Witness Koehler-Christensen, to which Staff must be
11 prepared to respond. This information is necessary to determine the amount of imputation that
12 required under the Settlement Agreement that is in effect between Qwest's predecessor and the
13 Arizona Commission. The information requested is directly relevant to the issue of determining the
14 amount of "fees and services" flowing from Qwest to DEX.

15 **G. Public Policy Expenses**

16 Set 58, Nos. 10, 13, and 14 (submitted 6/30)

17 **Set 58, No. 9:** For the test period, please update the Public Policy organization chart
18 (UTI 4-35A) and all of the position descriptions therein (UTI 2-08, 2-097-26, 14-05
19 and 23-10) so as to fully document all of the personnel and reporting relationships
20 within this organization in the updated test period.

21 **Set 58, No. 10:** In Decision No. 58297 in the Company's last rate case, the
22 Commission found (page 45) that "the Company recorded only six percent of overall
23 public policy organization expenses below the line" and that "Staff's proposal to split
24 the costs between ratepayers and shareholders to be a fair resolution". Please provide
25 calculations indicating the percentage of overall public policy organization expenses
26 (by RC) that were actually recorded below the line in the updated 1999 test period
27 and the ratemaking adjustment that would be required to increase this percentage to
28 50 percent, in accordance with the Commission's prior order.

Set 58, No. 13: Please provide representative copies of specimen work products that
were received by Public Policy personnel of USWC in 1999 as a result of work
performed by Washington Office personnel and costs charged to USWC, including:

1. White or position papers on legislative or regulatory topics,
2. Newsletters and other periodic publications,
3. Analyses of pending legislation,
4. Regulatory analyses,
5. Recommendations for action in support of corporate legislative

- initiatives,
5. Recommendations of action in support of corporate regulatory initiatives,
6. Other representative recurring work product documents

Set 58, No. 14: Please provide representative copies of specimen work products that were prepared by or for Public Policy personnel of USWC in 1999 and included within Arizona test period expenses of USWC, including:

1. White or position papers on legislative or regulatory topics,
2. Newsletters and other periodic publications,
3. Analyses of pending legislation,
4. Regulatory analyses,
5. Recommendations of action in support of corporate legislative initiatives,
6. Recommendation of action in support of corporate regulatory initiatives,
7. Other representative recurring work product documents.

Staff has requested this information to ensure that the allocations to Arizona concerning public policy expenses are reasonable. Staff must evaluate Qwest's Public Policy activities and costs to see if the 50 percent disallowance ordered by the Commission for such costs in the last case should be imposed or modified in this case.

H. Miscellaneous

Set 61, No. 6 (submitted 7/13)

Set 62, Nos. 6-8, 13, and 19 (submitted 7/14)

Set 61, No. 6: (Ref. USWC's responses to UTI 50-08, Attachment A and UTI 50-09, Attachment A) Please provide a breakdown of the \$2,348,277 and \$203, 036 amounts in UTI 50-08A by RC and reconcile such amount to the YTD total dollars identified in UTI 50-09A for each RC. In addition, please explain the selection process employed in determining which RC's to include in the UTI 50-08 calculations.

Set 62, No. 6: Please explain the Company's corporate branding and identity strategy for each segment of the business upon consummation of the merger with Qwest and provide complete copies of all market surveys, identity studies, consulting reports and other documents in the possession of the Company or any affiliates that is associated with the company's branding and identity strategy decisions.

Set 62, No. 13: (Ref. USWC's response to RUCO 26-03, Attachment B) Regarding the \$1,900,000 in Misc. Revenue Normalization Adj., please explain and provide a detailed statement of all underlying assumptions, volumes, calculations and supporting information for each component part of this amount.

1 **Set 62, No. 19: (Ref. USWC's response to UTI 24-19):** Please provide an update through
2 1999 for the cumulative incurred costs related to interconnection, in the format of the 2-page
3 Attachment A.

4 To the best of Staff's knowledge, the Company has only raised an objection to providing the
5 information requested to only a small number of questions in these sets. All of the information
6 requested is relevant to the issues raised in this case and will make the existence of facts more or less
7 probable. With regard to Set 62, No. 6, Qwest submitted a response on July 25, indicating that the
8 information was proprietary, confidential and commercially sensitive. The Staff has signed a
9 protective agreement covering confidential information, and therefore, this is not a valid reason for
10 the Company not to produce the information. Therefore, the Hearing Division should order Qwest
11 to immediately provide the information requested.

12
13 **III. CONCLUSION**

14 Staff's ability to assemble its filing has been compromised by the delayed response times
15 of the Company. As of June 20, 2000, the Company has taken approximately 12 days to
16 respond to Staff's discovery requests submitted since May 25, 2000.

17 There is no question that the data requests identified above and submitted to Qwest are
18 relevant and reasonably calculated to lead to admissible evidence. The Hearing Division should
19 order Qwest to immediately provide the information requested by Staff so that Staff can complete
20 its evaluation of the Company's application and file its testimony.

21 RESPECTFULLY SUBMITTED this 25th day of July, 2000.

22
23
24 By: 

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2 copies of the foregoing were
3 filed this 25th day of July, 2000
4 with:

5 Docket Control
6 Arizona Corporation Commission
7 1200 W. Washington Street
8 Phoenix, AZ 85007

9 COPIES of the foregoing
10 were mailed/hand delivered
11 this 25th day of July, 2000
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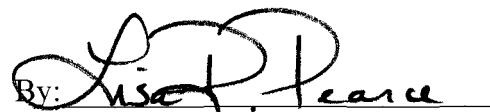
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By:  Lisa P. Pearce

MEMORANDUM

TO: Maureen Scott

FROM: Dawn A. Wilson
Paralegal

UPDATE

DATE: 7/20/2000

RE: Outstanding US West Responses of UTI Requests

Request #	Due Date
47-9	05-30-00
47-10	"
49-1	06-05-00
51-1	06-10-00
51-7	"
51-8	"
51-10	"
51-11	"
53-2	06-21-00
53-3	"
53-4	"
53-5	"
53-8	"
53-11	"
53-12	"
53-13	"
53-17	"
55-3	06-27-00
55-4	"
55-5	"
55-6	"
58-10	07-05-00
60-11	"
60-12	"
60-13	"
60-14	"
60-27	"
60-28	"
60-31	"
60-33	"
60-34	07-05-00

61-6	07-18-00
62-2	07-19-00
62-5	"
62-6	"
62-8	"
62-10	"
62-11	"
62-19	"
63-11	07-22-00
64-2	07-24-00
64-3	"
64-4	"
64-5	"
64-11	"
64-12	"
64-13	"
64-14	"
64-15	"
64-21	"
64-23	"
64-26	"
65-1	07-27-00
65-2	"
65-3	"
65-4	"
65-5	"
65-6	"
65-7	"
65-8	"
65-9	"
65-10	"
65-11	"
65-12	"
65-13	"
65-14	"
65-15	"
65-16	"
65-17	"
65-18	"
65-19	"
65-20	"
65-21	"
65-20	"